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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NUMBER 14 B.V.,

Case No.: 5:24-cv-02435-EKL

Plaintiff,

**JOINT STIPULATION AND
PROPOSED ORDER ON PATENT
ISSUES
[RE ECF No. 144]**

ANALOG DEVICES, INC.; MAXIM
INTEGRATED PRODUCTS, INC.

Defendants.

ANALOG DEVICES, INC.; MAXIM
INTEGRATED PRODUCTS, INC.,

Counterclaimants

Counterclaim

Counterclaimants,

NUMBER 14 B.V.,

Counter-Defendant.

1 Following the hearing on May 14, 2025, the Court directed the parties to “file a joint
 2 stipulation and proposed order setting forth a timeline and framework for disclosure of the parties’
 3 contentions regarding patent claims and product coverage,” and, if the parties are not able to reach
 4 agreement, to provide different proposals and request the Court’s assistance to resolve the dispute.
 5 ECF No. 144; ECF No. 147 at 29:2–10, 32:4–7.

6 Plaintiff/Counter-Defendant Number 14 B.V. (“Number 14”), and
 7 Defendants/Counterclaimants Analog Devices, Inc. and Maxim Products, Inc. (collectively,
 8 “Defendants”), jointly report that they have reached an agreement in terms of structure, content,
 9 and timing of their exchanges of contentions.

10 The parties HEREBY STIPULATE to the following to facilitate narrowing of the patent
 11 issues in this case:

12 1. Number 14 will serve on Defendants a preliminary identification of which claims of the
 13 four Licensed Patents¹ are utilized by which of Defendants’ products (by die number) (the
 14 “Number 14’s Preliminary Product Mapping”). This identification is merely to facilitate narrowing
 15 the issues between the parties in this litigation; Number 14 does not concede that it bears any
 16 burden to identify or prove that any particular product embodies or is covered by any claim of any
 17 patent to prevail on any claim for relief in the Complaint (ECF No. 1). Number 14 will undertake
 18 this identification in good faith using the information presently available to it, but the parties
 19 recognize that Number 14’s designation is preliminary, in view of Defendants’ confidentiality
 20 designations for documents that have been produced to date and the fact that Defendants possess
 21 additional technical documentation that has not yet been produced that may be relevant.
 22 (Defendants have stated that some of the documents showing what technology is incorporated in
 23 the products at issue will need to be produced under a Stipulated Source Code Protocol. See
 24 Stipulated Protective Order (ECF No. 90) § 8.)

25 2. For each product covered by the die numbers provided in Number 14’s Preliminary
 26 Product Mapping, Defendants will serve on Number 14 an identification of each limitation of each

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 28 1 As defined in Defendants’ Amended Counterclaim ¶ 103.

1 claim that Defendants contend is not found or present in that product along with an explanation of
 2 why such limitation is not included either literally or under the doctrine of equivalents
 3 (“Defendants’ Non-infringement Contentions”). To the extent Defendants articulate how a set of
 4 product part numbers or die numbers share the same or substantially the same qualities such that
 5 they, according to Defendants’ theory, do not possess the claim limitation in the same way,
 6 Defendants may treat those products as “representative.” *Uniloc USA Inc. v. LG Elecs. USA Inc.*,
 7 No. 5:18-cv-06738-LHK-SVK, 2019 WL 8809732, at *2 (N.D. Cal. Apr. 4, 2019) (citing *Bender v.*
 8 *Maxim Integrated, Inc.*, No. 3:09-cv-01152-SI, 2010 WL 1135762, at *3 (N.D. Cal. Mar. 22, 2010));
 9 *see also Network Prot. Scis., LLC v. Fortinet, Inc.*, No. C 12-01106 WHA, 2013 WL 5402089, at
 10 *3 (N.D. Cal. Sept. 26, 2013) (approving representative contentions where “adequate analysis”
 11 shows “products share the same critical characteristics”).

12 3. For each patent claim identified in Number 14’s Preliminary Product and Claim
 13 Mapping, Defendant will serve their Invalidity Contentions in accordance with the Court’s Patent
 14 L.R. 3-3.

15 4. The parties request that the following events and dates in the Court’s May 14, 2025
 16 Amended Case Management & Scheduling Order (ECF No. 145) be adjusted to accommodate the
 17 sequence of disclosures specified above: (1) Defendants’ invalidity contentions, (2) the parties’
 18 exchange of proposed terms for claim construction, and (3) the parties’ joint statement regarding
 19 proposed terms for construction. The parties therefore stipulate and request the Court to modify the
 20 schedule as shown below:

Event	Current Date (ECF No. 145)	Proposed Deadline
Number 14’s Preliminary Product Mapping	N/A	June 4, 2025
Defendants’ invalidity contentions (Patent L.R. 3-5)	May 28, 2025	June 25, 2025
Defendants’ Non-infringement Contentions	N/A	June 25, 2025
Parties exchange proposed terms for construction (Patent L.R. 4-1)	June 11, 2025	July 9, 2025
Parties file joint statement regarding proposed terms for construction	June 25, 2025	July 23, 2025

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2 **GREENFIELD LLP and**
3 **MEUNIER CARLIN & CURFMAN**

4 /s/Warren J. Thomas
5

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6 Attorneys for Plaintiff and Counter-Defendant NUMBER
7 14 B.V.

8 **ROPERS MAJESKI PC and**
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12 Attorneys for Defendants and Counterclaimants
13 ANALOG DEVICES, INC. and MAXIM INTEGRATED
14 PRODUCTS, INC.

15 **ATTESTATION PURSUANT TO LOCAL RULE 5-1 (i)(3)**

16 The undersigned attests pursuant to Local Rule 5-1(i)(3) that concurrence in the filing of
17 this document has been obtained from each of the other signatories hereto.

18 Dated: May 23, 2025

/s/ Warren J. Thomas

19 Counsel for Plaintiff

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ORDER

PURSUANT TO STIPULATION, IT IS ORDERED that the deadlines in the Amended Case Management and Scheduling Order, ECF No. 145, are FURTHER AMENDED as follows

Event	Current Date (ECF No. 145)	Proposed Deadline
Number 14's Preliminary Product Mapping	N/A	June 4, 2025
Defendants' invalidity contentions (Patent L.R. 3-5)	May 28, 2025	June 25, 2025
Defendants' Non-infringement Contentions	N/A	June 25, 2025
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Dated:

EUMI K. LEE
United States District Court Judge

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